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**MURPHY BROADCASTING**  
*101 Turtle Point Court*  
*St. Simons Island, GA 31522*  
**912-638-9404**

RECEIVED

MAY 15 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 15, 2000

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

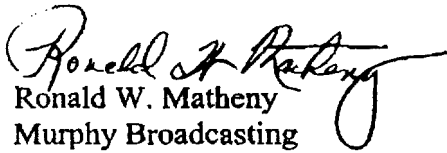
RE: Comments and Counterproposal  
MM Docket #00-56

Dear Madam Secretary:

Enclosed please find an original and two copies of the Comments and Counterproposal to be filed in MM Docket #00-56. I hereby verify that the statements contained in the enclosed Counterproposal are true, correct and complete to the best of my knowledge and belief and are made in good faith.

If there are any questions, please do not hesitate to contact me.

Sincerely,

  
Ronald W. Matheny  
Murphy Broadcasting

Enclosures

No. of Copies rec'd 012  
List ABCDE

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

## **COMMENTS AND COUNTERPROPOSAL**

**MM DOCKET #00-56**

**MUPRHY BROADCASTING**

**NEW FM RADIO STATION**

**BYROMVILLE, GEORGIA**

**May 2000**

## **TECHNICAL EXHIBIT**

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**COMMENTS AND COUNTERPROPOSAL**  
**MM DOCKET #00-56**  
**MURPHY BROADCASTING**  
**NEW FM RADIO STATION**  
**BYROMVILLE, GEORGIA**  
**May 2000**

1. This technical statement and attached exhibits were prepared on behalf of Murphy Broadcasting ("Murphy"). These comments are being submitted in response to a Commission Public Notice, MM Docket # 00-56, in which the allotment of Channel 221A to Eastman, Georgia, has been proposed. As an alternative to the Eastman, Georgia, request, Murphy herein proposes Channel 221A be allotted as the first local audio service to Byromville, Georgia.

**Byromville, Georgia, Proposal**

2. Byromville, Georgia, is located in northwest Dooly County, Georgia. Based on the 1990 Census, Byromville has a population of 452 persons. Presently, there is no AM or FM service licensed to Byromville. The allotment of Channel 221A would provide first locally licensable service to the community of Byromville.

3. Murphy, therefore, requests that Channel 221A be allotted to Byromville, Georgia, as that community's first local FM service at geographic coordinates North Latitude 32° 09' 54" and West Longitude 83° 54' 46". This reflects a site restriction of 3.5 kilometers south of the community to avoid shortspacing station WMKS, Channel 222A, Macon, Georgia.<sup>1</sup> From this location, a maximum Class A facility will deliver a 3.16 mV/m contour over the community of Byromville. Attached as Exhibit #1 is a usable area map depicting the usable area for Channel

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1) From this proposed location, Channel 221A is shortspaced to the proposed allotment of Channel 221A at Eastman, Georgia.

221A at Byromville, Georgia.<sup>2</sup> Attached as Exhibit #2 is a §73.207 spacing analysis showing that Channel 221A at Byromville meets the Commission's minimum distance separation requirements to all licensed and applied for facilities.<sup>3 4</sup>

4. Therefore, Murphy proposes the following changes in the Commission's Table of FM Allotments, §73.202b of the rules:

**Byromville, Georgia**

Present  
None

Proposed  
221A

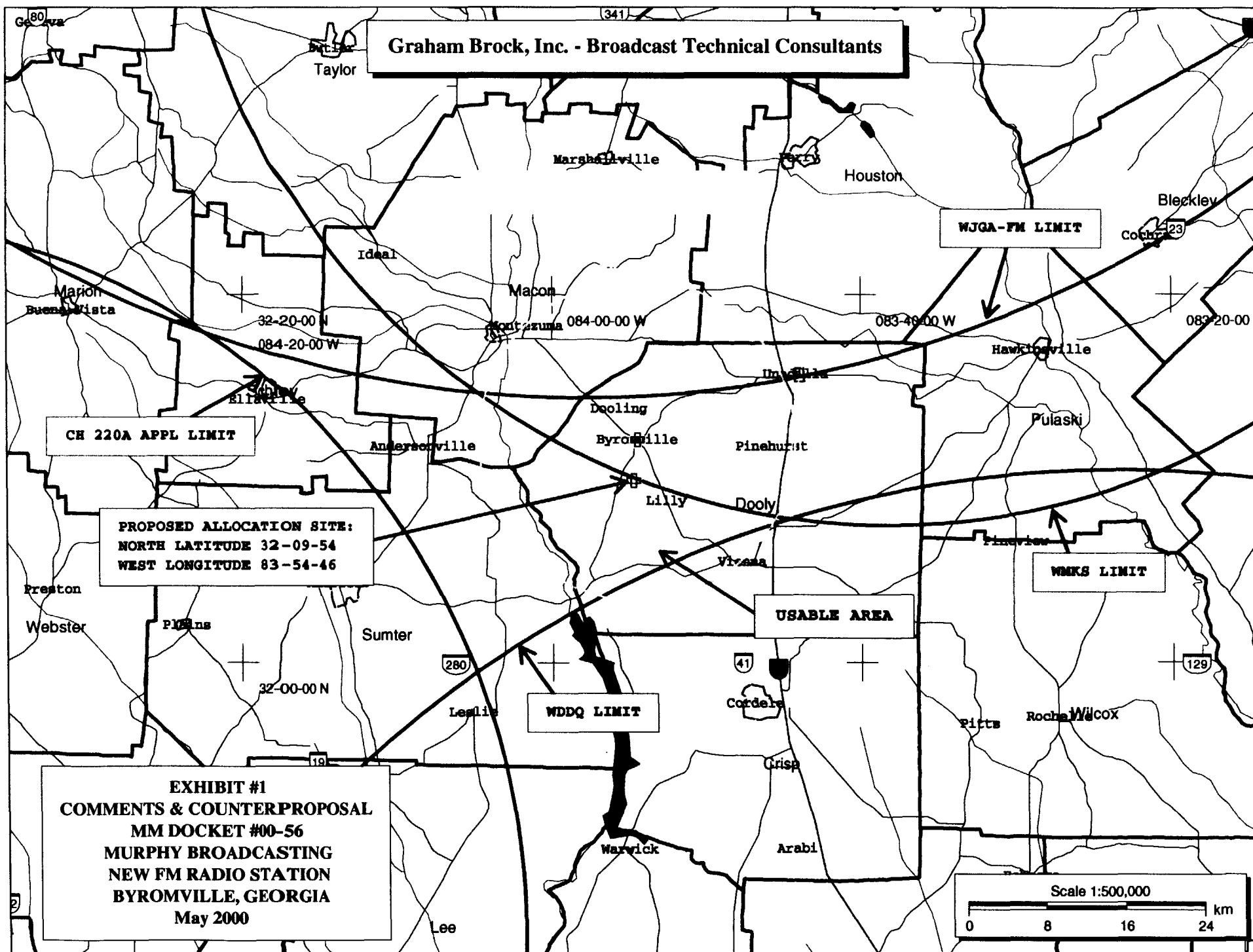
**Public Interest Aspects**

5. The allotment of Channel 221A in Byromville, Georgia, will provide first locally licensable FM service to the community of Byromville, Georgia. The allotment of Channel 221A to Byromville will provide 1.0 mV/m service to 40,937 persons in 2,553.80 square kilometers. This is an increase of 5,761 persons over the number served by the Eastman, Georgia, request.<sup>5</sup> When Channel 221A is allotted to Byromville, Georgia, and the filing window for the channel is announced, Murphy will submit, on a timely basis, an application or the appropriate expression of interest permit seeking authority to construct a new FM facility at Byromville, Georgia.

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- 2) The map does not consider the Channel 221A proposal at Eastman , Georgia.
- 3) With the exception of Channel 221A at Eastman, Georgia.
- 4) It is noted that this proposal is located near a Channel 6 Television station. However, since the 60 dBu contour of a Class A facility at the proposed coordinates of North Latitude 32° 09' 54", West Longitude 83° 54' 46" does not cross the 47 dBu (Grade B) contour of WCTV, Channel 6, Thomasville, Georgia, no Non-Commercial Educational FM preclusionary study on Channels 218, 219 or 220 is required (MM Docket #96-144).
- 5) The allotment of Channel 221A at Eastman, Georgia, will provide 1.0 mV/m service to 35,176 persons in 2,485.96 square kilometers.

6. This counterproposal is mutually exclusive with the proposal to allot Channel 221A to Eastman, Georgia. However, Eastman is presently served by WUFF (FM), Channel 248A, and WUFF, 710 kHz, both presently licensed to Eastman.

7. The foregoing comments were prepared on behalf of Murphy Broadcasting, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. The information contained in this application was extracted from the NTIA FM database as updated on May 5, 2000, and other sources. We assume no liability for errors or emissions in that database, which may be adverse to the request contained herein.



**COMMENTS AND COUNTERPROPOSAL**  
**MM DOCKET #00-56**  
**MURPHY BROADCASTING**  
**NEW FM RADIO STATION**  
**BYROMVILLE, GEORGIA**  
**May 2000**

**EXHIBIT #2**

SPACING STUDY FOR CHANNEL 221A AT BYROMVILLE, GEORGIA  
 USING ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS = A	DISPLAY DATES
32 09 54 N		DATA 05-05-00
83 54 46 W	Current Spacings	SEARCH 05-09-00
----- Channel 221 - 92.1 MHZ -----		

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.			HAAT			
WMKS	LIC 222A	Macon	GA	72.32	20.8	72.0	0.32
32 46 26	83 38 15	CN	3.000 kW	100 M			
	U.S. Broadcasting LP		BLH-19920813KB		54672		
WJGAFM	LIC 221A	Jackson	GA	123.42	357.7	115.0	8.42
33 16 37	83 57 59	CN	2.150 kW	114 M			
	Earnhart Broadcasting Co., Inc		BLH-19861029KB		18179		
WDDQ	LIC 221A	Adel	GA	124.07	156.6	115.0	9.07
31 08 15	83 23 41	CN	3.000 kW	91 M			
	Williams Investment Company		BLH-19791009AG		72786		
990224 APP	220A	Cuthbert	GA	94.61	241.4	72.0	22.61
31 45 18	84 47 26	CN	6.000 kW	62 M			
	American Family Association		BPED-19990224MA		92819		
WUNV	LIC 219A	Albany	GA	56.32	194.0	31.0	25.32
31 40 20	84 03 27	CN	3.000 kW	100 M			
	Georgia Public Telecomm. Comm		BLED-19900405KB		23919		

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

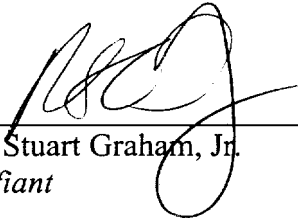
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**R. STUART GRAHAM**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Murphy Broadcasting to prepare the attached Technical Exhibit.

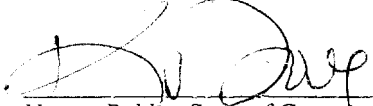
His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in Broadcast Engineering since 1972.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 12th day of May, 2000.*

  
\_\_\_\_\_  
R. Stuart Graham, Jr.  
Affiant

*Sworn to and subscribed before me  
this the 12th day of May, 2000.*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: April 20, 2002